

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
to Ensure Compatibility with Enhanced)	
E911 Emergency Calling Systems)	
)	

To: The Commission

**Carrier Report of South No. 5 RSA LP Regarding
Implementation of Wireless E911 Phase II Automatic Location Identification**

South No. 5 RSA LP d/b/a Brazos Cellular Communications, LLC ("Brazos") hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI"), in compliance with the Federal Communications Commission's ("FCC" or "Commission") Further Memorandum Opinion and Order in the above-captioned proceeding.

I. Background / Contact Information

Brazos serves rural Texas and its contact information is as follows:

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Manager

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II. E911 Phase II Location Technology Information

Brazos has chosen a handset-based solution for its Phase II ALI technology. Brazos is in the midst of exploring various handset solution vendors, but has yet to choose a vendor. Brazos is concerned about ubiquitous service to its subscribers and is considerate of which technology its most significant roaming partners such as SBC, USC, and AT&T will be choosing. Brazos plans to select a vendor by the end of the first quarter of 2001 and plans to use the same technology, once selected, throughout its service area.

III. Testing and Verification

Since Brazos is still examining multiple handset-based vendors, it has not conducted any testing so far. Brazos anticipates using a combination of Empirical Testing Methods and Predictive Testing Methods to gauge the accuracy of the technology it eventually chooses.

IV. Implementation Details and Schedule

The lack of availability of both technical and pricing information on many handset solutions makes any implementation schedule tentative, at best.¹ However, Brazos plans to make a vendor selection by March 31, 2001 and then comply with the FCC's handset rules provided that ALI-capable handsets are available.

V. PSAP Interface

Brazos has yet to receive a Phase II PSAP request. Brazos expects significant software and hardware changes in order to transmit Phase II data to PSAPs.² However, the majority of the transmission details remain up to the PSAP.

VI. Handset Information

Since no handsets are available yet, nor are any prices, Brazos has been unable to develop a concrete strategy for handset replacement or how to handle incompatible handsets. The price of ALI-capable handsets, unavailable at this time, will affect the Brazos replacement strategy. Brazos is concerned about incompatible handsets, especially with regard to roaming subscribers and is still in the process of comparing vendors and the vendors chosen by its major roaming partners to adequately address the incompatibility issue. Brazos plans to aggressively promote its new ALI-capable handsets when they become available to Brazos.

VII. Other Information

Brazos notes that the remote and rural nature of its service territory in Texas can present additional and unforeseen problems when installing and testing location technology. Brazos would have a much better handle on how it will eventually implement its Phase II plan if the vendor products were available for testing.

¹ While the public interest of providing Phase II capability overrides most cost concerns, a small company like Brazos must search for an economically feasible solution. Brazos notes that the opportunities for cost recovery in rural Texas by marketing ALI capabilities are not as prevalent as such opportunities in urban areas.

² In general, the following hardware and software is needed to transmit Phase II data to PSAPs: IS41C – Dialed Number Trigger, E911 Software, MPC – Mobile Positioning Center, PDE – Position Determining Entity, and receivers at each cell site.

Unfortunately, Brazos's Phase II implementation plan depends, in large part, upon the schedules and plans of the vendors.

November 9, 2000